## UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA TAMPA DIVISION

UNITED STATES OF AMERICA

VS.

Case No. 8:03-CR-77-T-30TBM

GHASSAN ZAYED BALLUT

## DEFENDANT GHASSAN BALLUT'S FOURTH UNOPPOSED MOTION TO PERMIT TRAVEL

The Defendant, GHASSAN BALLUT, by and through his undersigned counsel, hereby requests this Honorable Court to permit the Defendant to travel to visit his brother, Solomon Z. Ballut, and other relatives in Sylvania, Ohio, for a period of approximately three days from Saturday, March 12, through Tuesday, March 15, 2005, and as grounds therefor would state:

- 1. Under the terms of the Defendant's release as set forth in the Court's Orders of April 10, 2003 (Dkt. 74 at 27-28), and April 29, 2003 (Dkt. 107), the Defendant's travel is restricted to the Northern District of Illinois and the Middle District of Florida with travel permitted between those districts for court purposes and consultation with counsel, with the requirement that the Defendant inform Pretrial Services of any travel plan.
- 2. The Defendant has recently traveled from the Northern District of Illinois to the Middle District of Florida to attend a court hearing and review discovery in this cause, and intends to depart the Middle District of Florida by commercial bus not later than Saturday, March 12, 2005.
- 3. The Defendant proposes to travel by bus from the Middle District of Florida to the Northern District of Illinois by way of Sylvania, Ohio (in the vicinity of Toledo, Ohio), to the home of his brother, Solomon Z. Ballut, in Sylvania, Ohio, arriving on Saturday, March 12, or

Sunday, March 13, 2005, returning to his home in Tinley Park, Illinois, by Tuesday, March 15, 2005, by the most direct route, for the purpose of a family visit.

- 4. Solomon Z. Ballut is known to the Court as a personal surety who assisted in the posting of bond for the Defendant by the signing of documents filed with the Court in this cause.
- 5. The Defendant would notify Pretrial Services in advance with the details of his travel plan and itinerary and would comply with any and all directions from Pretrial Services.
- 6. Since his release on bond in April, 2003, the Defendant has traveled between the Northern District of Illinois and the Middle District of Florida several times without incident and in compliance with the conditions of his release.
- 7. The Defendant's undersigned counsel has contacted Assistant United States Attorney Walter Furr concerning this motion, and Mr. Furr has no objection to it.

WHEREFORE, the Defendant requests the Court for permission to travel from the Middle District of Florida not later than Saturday, March 12, 2005, to the home of his brother, Solomon Z. Ballut, in Sylvania, Ohio, returning to his home in Tinley Park, Illinois, by Tuesday, March 15, 2005, with such conditions as the Court deems appropriate.

Respectfully submitted,

/s Bruce G. Howie
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## **Certificate of Service**

I HEREBY CERTIFY that on March 10, 2005, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to the following:

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